PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Godfrey Conveyor Company, Inc. (Godfrey Marine)
4310 Middlebury Street
Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-8962-00267	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass and aluminum boat manufacturing operation.

Responsible Official:	Van Kessler
Source Address:	4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address:	4310 Middlebury Street, Elkhart, Indiana 46516
SIC Code:	3732
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) fiberglass application area located in Plant 6, consisting of one (1) gel coat booth, identified as gel6-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), and exhausting to one (1) stack, identified as EF6-1 and seven (7) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, and chop6-07 each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to six (6) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8 and EF6-9.

(2) One (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of one (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), exhausting to one (1) stack, identified as EF9-1 and one (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

(3) One (1) grinding booth, located in Plant 6, with a maximum capacity of 450 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to two (2) stacks, identified as EF6-2 and EF6-3.

(4) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) cyclone for particulate matter control, exhausting to the atmosphere.

(5) One (1) bilge painting process, located in Plant 6 in the general laminating department, utilizing one (1) air assisted airless spray gun (HVLP-F), with a maximum capacity of 21

units per hour, exhausting to one (1) stack, identified as EF6-9.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(a) Natural gas fired air make up units each with a heat input capacity of 5.0 mmBtu/hr.
(b) Twenty five (25) infrared exhaust heaters with a total heat input capacity of 2.2 mmBtu/hr.

(2) The following VOC and HAP storage containers:

(a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(3) Equipment used exclusively for the following:

(a) Packaging lubricants or greases.
(b) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(5) Cleaners and solvents characterized as follows:

(a) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
(b) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(a) Ten (10) aluminum pontoon welding stations located in Plant 2.
(b) One (1) welding station located in Plant 9.
(c) Metal fabrication operations located in Plant 3 consisting of several TIG welding units and one (1) MIG welding unit.

(7) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(8) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

(9) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPS.

(a) One (1) vinyl floor roll-on station, located in Plant 2, utilizing PBA adhesive.
(b) One (1) carpeting roll-on station, located in Plant 2, utilizing Imperial 774700

adhesive.

(c) One (1) foam gluing spray booth, located in Plant 7, utilizing Mydrin adhesive, with particulate matter emissions controlled by dry filters.

(d) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 8.

(10) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(11) Paved and unpaved roads and parking lots with public access.

(12) Emergency generators as follows:

(a) Gasoline generators not exceeding 110 horsepower.
(b) Diesel generators not exceeding 1600 horsepower.
(c) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(14) Activities or categories of activities with individual HAP emissions not previously identified; any emitting unit greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.

(a) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans located in Plants 6, 5 and 2.
(b) Spot repair/touch-up paint of fiberglass boats using hand held spray cans located in Plant 6 in the general laminating department.
(c) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 6 in the general laminating department, with one (1) Binks model No. 62 air atomized spray gun, utilizing Elpaco quick dry enamel.
(d) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 9, using DBF body filler.

(15) Activities or categories of activities with a combination of HAP emissions not previously identified; any emitting unit greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.

(a) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans located in Plants 6, 5 and 2.
(b) Spot repair/touch-up paint of fiberglass boats using hand held spray cans located in Plant 6 in the general laminating department.
(c) Spot repair/touch-up gel coat of fiberglass boats and/or parts located in Plant 6 in the general laminating department, with one (1) Binks model No. 62 air atomized spray gun, utilizing Elpaco quick dry enamel.
(d) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 9, using DBF body filler.

(16) Other activities or categories not previously identified:

Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(a) One (1) foam gluing spray booth, located in Plant 7, with particulate matter emissions controlled by dry filters.

(b) One (1) floatation foam injection station, located in Plant 6 in the general laminating department, with an air purge system for floatation foam application, with yearly MDI emissions estimated to be 0.034 pounds.

(c) One (1) adhesive application operation of vinyl covers to seats, located in Plant 7, utilizing Bostic Supertak (hand held spray cans) on non-polyethylene surfaces, and 3M Hi Strength 90 on polyethylene surfaces.

(d) One (1) surface preparation operation located in Plant 3, utilizing Terpaclean (citrus based cleaner) and Beaver Kleer-vu glass cleaner--120 grams VOC/liter.

(e) One assembly operation located in Plant 6, utilizing one (1) portable glue gun using a solvent based Imperial adhesive; One (1) putty gun using polyester putty for caulking; several hand held guns using urethane caulk, silicone Sila-Seal, and Bostic Fastset; and spray can of Bostic 150724 Supertak adhesive.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in
IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC

5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM,within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is

declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) One (1) fiberglass application area located in Plant 6, consisting of one (1) gel coat booth, identified as gel6-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), and exhausting to one (1) stack, identified as EF6-1 and seven (7) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, and chop6-07 each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to six (6) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8 and EF6-9.

(2) One (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of one (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), exhausting to one (1) stack, identified as EF9-1 and one (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

(3) One (1) grinding booth, located in Plant 6, with a maximum capacity of 450 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to two (2) stacks, identified as EF6-2 and EF6-3.

(4) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) cyclone for particulate matter control, exhausting to the atmosphere.

(5) One (1) bilge painting process, located in Plant 6 in the general laminating department, utilizing one (1) air assisted airless spray gun (HVLP-F), with a maximum capacity of 21 units per hour, exhausting to one (1) stack, identified as EF6-9.

(6) One (1) insignificant degreasing operation that does not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD Rules) [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOCs is limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential to emit of VOCs or any other criteria pollutant to 250 tons per year or greater, from the equipment covered in this permit, shall require prior approval from IDEM, OAM before such change may occur.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) The one (1) bilge painting process, located in Plant 6 in the general laminating department, shall be limited to less than fifteen (15) tons of VOC per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 will not apply.

(b) The one (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of gel9-01 and chop9-01, shall be limited to less than ten (10) tons VOC per twelve (12) consecutive month period. Therefore, the requirements

of 326 IAC 8-1-6 will not apply.

(c) Pursuant to 326 IAC 8-1-6, Best Available Control Technology for the fiberglass application area located in Plant 6, shall be the following:

(1) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) VOCs for the fiberglass application area located in Plant 6, consisting of gel6-01 and chop6-01-chop6-07 shall be less than 220 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(A) VOC emissions from the application of gel coat and resins shall be calculated as volatile organic HAP emissions. Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(B) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites”, Composites Fabricators Associations, April 20, 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(2) The total monomer contents of all resins and gel coats used shall be limited to 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

The use of resins with HAP monomer contents lower than 35%, gel coats with HAP monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with HAP monomer contents higher than 35%, and/or gel coats with HAP monomer contents higher than 37%. This is allowed to meet the HAP monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) # (Emissions from 35% resin or 37% gel coat) - (Emissions from >35% resin, >37% gel coat, and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(3) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray mechanical applications of a design and specifications approved by IDEM, OAM.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(4) Optimized spray techniques according to a manner approved by IDEM, OAM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(5) A one (1) quart, air atomized spray gun may be used as needed for touch-up purposes only.

(6) The listed work practices shall be followed:

(A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(B) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored,

transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(C) Storage containers shall be kept covered when not in use.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding booth and the four (4) woodworking machines shall not exceed 1.51 and 2.09 pounds per hour, respectively, when operating at a process weight rate of 450 and 729 pounds per hour respectively.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(b) The particulate matter (PM) from the fiberglass operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.4 Cold Cleaner Degreasing Operation [326 IAC 8-3-2]

The Permittee of the insignificant degreasing operation shall:

(1) Equip the cleaner with a cover;
(2) Equip the cleaner with a facility for draining cleaned parts;
(3) Close the degreaser cover whenever parts are not being handled in the cleaner;
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label summarizing the operating requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fiberglass operations and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

D.1.9 Particulate Matter (PM)

The cyclone and dry filters for PM control shall be in operation at all times when the grinding booth, fiberglass operations, and the four (4) woodworking machines are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

(a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Visible Emissions Notations

(a) Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below for the fiberglass operations. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The usage by weight and volatile organic HAP monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) The calculated total volatile organic HAP emissions from resin and gel coat use for each month.

(b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below for the bilge painting operation. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) A log of the dates of use;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The total VOC usage for each month;

(4) The weight of VOCs emitted for each compliance period.

(5) The cleanup solvent usage for each month;

(c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.1.11, the Permittee shall maintain records of weekly visible emission notations of the painting and fiberglass operations' stack exhaust.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Godfrey Conveyor Company, Inc. (Godfrey Marine)
Source Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-8962-000267

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Godfrey Conveyor Company, Inc. (Godfrey Marine)
Source Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-8962-000267

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Godfrey Conveyor Company, Inc. (Godfrey Marine)
Source Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-8962-000267
Facility: gel6-01, chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06 and chop6-07.
Parameter: VOC
Limit: PTE less than 220 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Usage/Emissons (tons/month)	VOC Usage/Emissions Previous 11 Months (tons)	VOC Usage/Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Godfrey Conveyor Company, Inc. (Godfrey Marine)
Source Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-8962-000267
Facility: Fiberglass application area for production of boat molds: gel9-01 and chop9-01
Parameter: VOC
Limit: PTE less than 10 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Usage/Emissons (tons/month)	VOC Usage/Emissions Previous 11 Months (tons)	VOC Usage/Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Godfrey Conveyor Company, Inc. (Godfrey Marine)
Source Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-8962-000267
Facility: Bilge painting process located in Plant 6
Parameter: VOC
Limit: PTE less than 15 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Usage/Emissons (tons/month)	VOC Usage/Emissions Previous 11 Months (tons)	VOC Usage/Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Godfrey Conveyor Company, Inc. (Godfrey Marine)
Source Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-8962-000267

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name: **Godfrey Conveyor Company, Inc. (Godfrey Marine)**
Source Location: **4310 Middlebury Street, Elkhart, Indiana 46516**
County: **Elkhart**
SIC Code: **3732**
Operation Permit No.: **T039-8962-00267**
Permit Reviewer: **Felicity L. Lao**

On August 9, 1999, the Office of Air Management (OAM) had a notice published in the Elkhart Truth newspaper, Elkhart, Indiana, stating that Godfrey Conveyor Company, Inc. (Godfrey Marine) had applied for a Part 70 Operating Permit to operate a fiberglass and aluminum boat manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes to the final Part 70 permit (changes are bolded for emphasis):

(1) Condition D.1.2 has been revised as follows:

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) The one (1) bilge painting process, located in Plant 6 in the general laminating department, shall be limited to less than fifteen (15) tons of VOC per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 will not apply.

(b) The one (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of gel9-01 and chop9-01, shall be limited to less than ten (10) tons VOC per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 will not apply.

(c) Pursuant to 326 IAC 8-1-6, Best Available Control Technology for the fiberglass application area located in Plant 6, ~~has been determined to be~~ **shall be the following**:

(1) Use of resins and gel coats **that contain styrene** shall be limited such that the potential to emit **(PTE)** ~~of~~ VOCs for the fiberglass application area located in Plant 6, consisting of gel6-01 and chop6-01-chop6-07 shall be less than 220 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(A) **VOC emissions from the application of gel coat and resins shall be calculated as volatile organic HAP emissions.** Monthly usage by weight, weight percent content of all monomers that are ~~VOCs~~ **volatile organic HAP**, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. ~~VOC~~ **volatile organic HAP** emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the **HAP monomer** content ~~of each monomer~~, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(B) ~~Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors~~ **The emission factors approved for use by IDEM, OAM** shall be taken from the following reference ~~approved by IDEM, OAM~~: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Associations, April 20, 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. ~~The emission factors used for monomer that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied.~~ For the purposes of these emission calculations, **HAP** monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(2) The total monomer contents of all resins and gel coats used shall be limited to 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. **HAP** monomer contents shall be calculated on a neat basis, ~~i.e.,~~ **which means** excluding any filler. Compliance with these **HAP** monomer content limits shall be demonstrated on a monthly basis.

The use of resins with **HAP** monomer contents lower than 35%, gel coats with **HAP** monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with **HAP** monomer contents higher than 35%, and/or gel coats with **HAP** monomer contents higher than 37%. ~~Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, or installing a control device with an overall reduction efficiency of 95%.~~ This is allowed to meet the **HAP** monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) # (Emissions from 35% resin or 37% gel coat) - (Emissions from >35% resin, >37% gel coat, and/or **using** other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (**HAP** monomer emission factor for resin or gel coat used, %);

EF, **HAP** monomer emission factor = emission factor, expressed as ~~% monomer~~ **pounds (lbs) HAP** emitted per ~~weight of resin applied~~ **ton of resin/gel coat** ~~applied~~ **processed**, which is indicated by the **HAP** monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(3) ~~Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used at all times to apply unfilled resins.~~ **Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray mechanical applications of a design and specifications approved by IDEM, OAM.**

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(4) Optimized spray ~~technology~~ **techniques according to a manner** approved by IDEM**, OAM** shall be used ~~at all times to apply~~ **for** gel coats and filled resins **(where fillers are required for corrosion or fire retardant purposes) at all times**. Optimized spray ~~technology~~ **techniques** include~~s~~, but ~~is~~ **are** not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(5) A one (1) quart, air atomized spray gun may be used as needed for touch-up purposes only.

(6) The listed work practices shall be followed:

(A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(B) For ~~solvents that are~~ VOC**- and/or HAP-containing materials**:

(i) Cleanup solvent containers **shall be** used to transport solvent from drums to work ~~stations shall be closed containers having soft gasketed spring-loaded closures~~.

(ii) ~~Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed~~

~~tightly.~~ **Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.**

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

~~(iii)~~**(iv)** The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

~~(iv)~~**(v)** All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed ~~when not in use~~ **as soon as solvent spraying is complete and** the waste solvent shall be ~~handled~~ **disposed of** in such a manner that evaporation is minimized~~, and managed in accordance with applicable solid or hazardous waste requirements~~.

~~(v)~~**(C)** Storage containers shall be kept covered when not in use.

(2) Condition D.1.12 has been changed to be as follows to clarify the requirements for record keeping

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (~~3~~ **4**) below. Records maintained for (1) through (~~3~~ **4**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The usage by weight and monomer content of each resin and gel coat and the amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

~~(4) The volume weighted VOC content of the coatings used for each month;~~

~~(5)~~**(4)** The calculated total volatile organic HAP emissions from resin and gel coat use for each month.

(b) **To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below for the bilge painting operation. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.**

(1) **A log of the dates of use;**

(2) **The volume weighted VOC content of the coatings used for each month;**

~~(6)~~**(3)** The total VOC usage for each month;

~~(7)~~**(4)** The weight of VOCs emitted for each compliance period.

~~(8)~~**(5)** The cleanup solvent usage for each month;

~~(b)~~**(c)** To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

~~(c)~~**(d)** To document compliance with Condition D.1.11, the Permittee shall maintain records of weekly visible emission notations of the painting and fiberglass operations' stack exhaust.

~~(d)~~**(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(3) The reference to gel 9-01 and chop 9-01 have been removed from the quarterly reporting form on page 40 of 43. The limit on this form has also been changed from 235 tons to 220 tons to be consistent with the limits set forth in the permit.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: **Godfrey Conveyor Company, Inc. (Godfrey Marine)**
Source Location: **4310 Middlebury Street, Elkhart, Indiana 46516**
County: **Elkhart**
SIC Code: **3732**
Operation Permit No.: **T039-8962-00267**
Permit Reviewer: **Felicity L. Lao**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Godfrey Conveyor Company, Inc. relating to a fiberglass and aluminum boat manufacturing operation.

Source Definition

This fiberglass and aluminum boat manufacturing company consists of six (6) plants:

(1) Plant 2 (PONTOON) is located at 4310 Middlebury Street, Elkhart Indiana 46516;

(2) Plant 3 (METAL FAB) is located at 631 Bullard Road, Elkhart, Indiana 46516;

(3) Plant 6 (HURRICANE) is located at 720 CR 15, Elkhart, Indiana 46516;

(4) Plant 7 (WOOD SHOP) is located at 651 Bullard Road, Elkhart Indiana 46516;

(5) Plant 8 (ENGINE WHS) is located at 4301 Bullard Road, Elkhart Indiana 46516; and

(6) Plant 9 (MOLD SHOP) is located at 430 CR 15, Elkhart Indiana 46516.

Note: “Plant” in this case refers to building numbers. Most of the operations are performed in Plant 6 and Plant 9. Woodworking operations are located in Plant 7.

Since the six (6) plants are located on contiguous properties, and are owned/leased by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) One (1) fiberglass application area located in Plant 6, consisting of one (1) gel coat booth, identified as gel6-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), and exhausting to one (1) stack, identified as EF6-1 and six (6) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, and chop6-06, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to six (6) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, and EF6-9.

(2) One (1) grinding booth, located in Plant 6, with a maximum capacity of 450 pounds of flange material processed per hour, equipped with dry filters for particulate matter control,

exhausting to two (2) stacks, identified as EF6-2 and EF6-3.

(3) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) cyclone for particulate matter control, exhausting to the atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(1) One fiberglass chop station, identified as chop6-07, that is part of the fiberglass application area located in Plant 6, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, and exhausting to six (6) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, and EF6-9.

(2) One (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of one (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), exhausting to one (1) stack, identified as EF9-1 and one (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

(3) One (1) bilge painting process, located in Plant 6 in the general laminating department, utilizing one (1) air assisted airless spray gun (HVLP-F), with a maximum capacity of 21 units per hour, exhausting to one (1) stack, identified as EF6-9.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(a) Natural gas fired air make up units each with a heat input capacity of 5.0 mmBtu/hr.
(b) Twenty five (25) infrared exhaust heaters with a total heat input capacity of 2.2 mmBtu/hr.

(2) The following VOC and HAP storage containers:

(a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(3) Equipment used exclusively for the following:

(a) Packaging lubricants or greases.
(b) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(5) Cleaners and solvents characterized as follows:

(a) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
(b) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(a) Ten (10) aluminum pontoon welding stations located in Plant 2.
(b) One (1) welding station located in Plant 9.
(c) Metal fabrication operations located in Plant 3 consisting of several TIG welding units and one (1) MIG welding unit.

(7) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(8) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

(9) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPS.

(a) One (1) vinyl floor roll-on station, located in Plant 2, utilizing PBA adhesive.
(b) One (1) carpeting roll-on station, located in Plant 2, utilizing Imperial 774700 adhesive.
(c) One (1) foam gluing spray booth, located in Plant 7, utilizing Mydrin adhesive, with particulate matter emissions controlled by dry filters.
(d) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 8.

(10) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(11) Paved and unpaved roads and parking lots with public access.

(12) Emergency generators as follows:

(a) Gasoline generators not exceeding 110 horsepower.
(b) Diesel generators not exceeding 1600 horsepower.
(c) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(14) Activities or categories of activities with individual HAP emissions not previously identified; any emitting unit greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.

(a) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans located in Plants 6, 5 and 2.
(b) Spot repair/touch-up paint of fiberglass boats using hand held spray cans located in Plant 6 in the general laminating department.
(c) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 6 in the general laminating department, with one (1) Binks model No. 62 air atomized spray gun, utilizing Elpaco quick dry enamel.

(d) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 9, using DBF body filler.

(15) Activities or categories of activities with a combination of HAP emissions not previously identified; any emitting unit greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.

(a) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans located in Plants 6, 5 and 2.
(b) Spot repair/touch-up paint of fiberglass boats using hand held spray cans located in Plant 6 in the general laminating department.
(c) Spot repair/touch-up gel coat of fiberglass boats and/or parts located in Plant 6 in the general laminating department, with one (1) Binks model No. 62 air atomized spray gun, utilizing Elpaco quick dry enamel.
(d) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 9, using DBF body filler.

(16) Other activities or categories not previously identified:

Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(a) One (1) foam gluing spray booth, located in Plant 7, with particulate matter emissions controlled by dry filters.
(b) One (1) floatation foam injection station, located in Plant 6 in the general laminating department, with an air purge system for floatation foam application, with yearly MDI emissions estimated to be 0.034 pounds.
(c) One (1) adhesive application operation of vinyl covers to seats, located in Plant 7, utilizing Bostic Supertak (hand held spray cans) on non-polyethylene surfaces, and 3M Hi Strength 90 on polyethylene surfaces.
(d) One (1) surface preparation operation located in Plant 3, utilizing Terpaclean (citrus based cleaner) and Beaver Kleer-vu glass cleaner--120 grams VOC/liter.
(e) One assembly operation located in Plant 6, utilizing one (1) portable glue gun using a solvent based Imperial adhesive; One (1) putty gun using polyester putty for caulking; several hand held guns using urethane caulk, silicone Sila-Seal, and Bostic Fastset; and spray can of Bostic 150724 Supertak adhesive.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(1) CP No. 039-3683-00267, issued December 16, 1994.

(2) Registration permit issued on March 4, 1985.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(1) CP No. 039-3683-00267, issued December 16, 1994.

Condition 4 which states that the VOC emissions from the gel coats, layup booths and

lamination area shall be limited to 8 tons per month... therefore, 326 IAC 2-2 is not applicable.

This condition has not been incorporated because the reason for requiring the 8 ton per month (96 ton per year) VOC limit no longer exists. When the source was previously permitted, Elkhart County, where the source is located, was designated as non-attainment for ozone. The limit was requested by the source so that 326 IAC 2-3, Emission Offset, would not apply. (The incorrect rule was cited in the previous permit condition; 326 IAC 2-3, not 2-2, should have been cited.) However, Elkhart County has since been re-designated as attainment for ozone and 326 IAC 2-3 is no longer applicable. At the source's request, the 96 ton per year VOC limit has been increased to less than (<) 250 tons per year. 326 IAC 2-2, Prevention of Significant Deterioration is now the relevant new source permitting rule and this limit ensures that it does not apply.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is aware that Godfrey Conveyor Company, Inc. submitted their Title V application (September 11, 1997) past the December 13, 1996 due date, violating 326 IAC 2-7.

(c) IDEM is reviewing the above listed matters and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 11, 1997. Notice of Deficiency letters were mailed on March 24, 1998, April 27, 1998, and September 21, 1998.

A notice of completeness letter was mailed to the source on September 19, 1997.

Emission Calculations

See Appendix A page 1 of 1 for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential to Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 250

CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential to Emit (tons/year)
Styrene	greater than 10
Methyl Methacrylate	greater than 10
4,4-Diphenylmethane Diisocyanate	less than 10
Toluene	less than 10
Xylene	less than 10
Ethyl Benzene	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 1-2-55) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 1-2-55) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects Godfrey Conveyor Company, Inc's 1996 emission data.

Pollutant	Actual Emissions (tons/year)
PM	N/A
PM-10	N/A
SO_2	N/A
VOC	44.6
CO	N/A
NO_x	N/A
Styrene	40.3
Methyl Methacrylate	4.3
4,4-Diphenylmethane Diisocyanate	0.00
Toluene	2.0
Xylene	0.7
Ethyl Benzene	0.7

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Plant 6, fiberglass operations				less than 220			

Plant 6, bilge painting operation				less than 15			
Plant 9, fiberglass operations				less than 10			
insignificant activities				less than 5			
Total Emissions				less than 250*			

*This is the new PTE VOC limit for the entire source, as relaxed in this permit, pursuant to 326 IAC 2-2, due to Elkhart County being redesignated as attainment for ozone. In keeping with the total source VOC limit, the source has agreed to take a VOC limit of less than 220 tons per year for all of Plant 6 fiberglass operations, less than fifteen (15) tons per year for Plant 6 bilge painting operations, and a limit of less than ten (10) tons per year for Plant 9 fiberglass operations, all to avoid 326 IAC 8-1-6 applicability. Five (5) tons per year have been allotted for insignificant activities.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12) (40 CFR Part 60) applicable to this source.

(b) The insignificant degreasing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63), Subpart T because there are no halogenated solvents used in the degreasing process.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on September 11, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Rules)

(a) The total source potential to emit of VOCs is limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential to emit of VOCs or any other criteria pollutant to 250 tons per year or greater, from the equipment covered in this permit, shall require prior approval from IDEM, OAM before such change may occur.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC's. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding booth and the four (4) woodworking machines shall not exceed 1.51 and 2.09 pounds per hour, respectively, when operating at a process weight rate of 450 and 729 pounds per hour respectively.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The cyclone and dry filters shall be in operation at all times the four (4) woodworking machines and the grinding booth are in operation, respectively, in order to comply with this limit.

(b) The particulate matter (PM) from the fiberglass operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the fiberglass operations are in operation, in order to comply with this limit.

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

(a) The one (1) bilge painting process, located in Plant 6 in the general laminating department, shall be limited to less than fifteen (15) tons VOC per twelve (12) consecutive month period; therefore, the requirements of 326 IAC 8-1-6 will not apply.

(b) The one (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of gel9-01 and chop9-01, shall be limited to less than ten (10) tons VOC per twelve (12) consecutive month period; therefore, the requirements of 326 IAC 8-1-6 will not apply.

(c) 326 IAC 8-1-6 is applicable to all of the Plant 6 fiberglass operations. The gel coat booth, gel6-01 and six (6) of the fiberglass chop stations, chop6-01-chop6-06 were subject to this rule when permitted. The seventh fiberglass chop station, chop6-07, which was previously unpermitted, is also subject to this rule. Relaxing the previous 96 ton per year limit, taken so that 326 IAC 2-3 would not apply, also makes it necessary under 326 IAC 8-1-6 to re-evaluate the BACT for the gel coat booth, gel6-01 and the six (6) fiberglass chop stations, chop6-01-chop6-06, and to determine BACT for the first time for the seventh unpermitted fiberglass chop station, chop6-07. It has been determined that the same BACT is applicable to all seven (7) fiberglass chop stations. Pursuant to 326 IAC 8-1-6, Best Available Control Technology for the fiberglass application area located in Plant 6, consisting of gel6-01 and chop6-01-chop6-07 shall be:

(1) Use of resins and gel coats shall be limited such that the potential to emit (PTE) of volatile organic compounds for the fiberglass application area located in Plant 6, consisting of gel6-01 and chop6-01-chop6-07 shall be less than 220 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(A) Monthly usage by weight, weight percent content of all monomers that are VOCs, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the content of

each monomer, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "Unified Emission Factors for Open Molding of Composites, April 20, 1999. The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or methylmethacrylate shall be considered as styrene on an equivalent weight basis.

(2) The total monomer contents of all resins and gel coats used shall be limited to 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) # (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin, <37% gel coat, and/or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % monomer emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(3) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used at all times to apply unfilled and filled resins.

(4) Optimized spray technology approved by IDEM shall be used at all times to apply gel coats and filled resins. Optimized spray techniques include, but are

not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(5) A one (1) quart, air atomized spray gun may be used as needed for touch up purposes only.

(6) The listed work practices shall be followed:

(A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(B) For solvents that are VOC:

(i) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(ii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iii) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(iv) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed when not in use. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.

(v) Storage containers shall be kept covered when not in use.

326 IAC 8-3-2 (Cold Cleaner Degreasing Operation)

(a) The insignificant degreasing operation is located in Elkhart county at a source with VOC potential emissions greater than 100 tons per year, therefore, 326 IAC 8-3-2 is applicable.

(b) The Permittee of the insignificant degreasing operation shall:

(1) Equip the cleaner with a cover;
(2) Equip the cleaner with a facility for draining cleaned parts;
(3) Close the degreaser cover whenever parts are not being handled in the cleaner;
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label summarizing the operating requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty (20%) of

the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The grinding booth, fiberglass operations, and four (4) woodworking machines have applicable compliance monitoring conditions as specified below:

(1) The cyclone for PM control shall be in operation at all times when the four (4) woodworking machines is in operation.

(2) Dry filters for PM control shall be in operation at all times when the fiberglass operations and the grinding booth are in operation.

(3) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(4) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(5) Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(A) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(B) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(C) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(D) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(6) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used and emitted by sources. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) Even though this source is a major source of HAPs, the emitting units were constructed prior to July 27, 1997; therefore, 326 IAC 2-4.1 is not applicable.

Conclusion

This fiberglass and aluminum boat manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-8962-00267**.

POTENTIAL EMISSIONS CALCULATIONS

RESIN CALCULATIONS

423 pounds styrene / boat	x	% weight styrene / 0.35	=	1208.57 pounds of resin / boat
1208.57 pounds of resin / boat	x	73 boats / week	=	88225.714 pounds of resin / week
8225.714 pounds of resin / week	x	week / 168 hours	=	**525 pounds of resin per hour**
525 pounds resin per hour	x	7.0% emission factor	=	36.75 pounds of resin per hour (emissions)
36.75 pounds emissions / per hour	x	4.38	=	**160.965 tons of resin per year**

GEL COAT CALCULATIONS

423 pounds styrene / boat	x	% weight styrene / 0.37	=	1143.24 pounds of gel coat / boat
1143.24 pounds of gel coat / boat	x	73 boats / week	=	83456.76 pounds of gel coat / week
83456.76 pounds of gel coat / week	x	week / 168 hours	=	**497 pounds of gel coat per hour**
497 pounds gel coat per hour	x	18.8% emission factor	=	93.44 pounds of gel coat per hour (emissions)
93.44 pounds emissions / per hour	x	4.38	=	**409.25 tons of gel coat per year**

TOTAL POTENTIAL EMISSIONS FROM FIBERGLASS OPERATIONS = 570.21 tons per year